

Data Broadcasting International Ltd

Response To The Governments Consultation Paper –
“DIGITAL TELEVISION: THE PRINCIPLES FOR SPECTRUM PLANNING”

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1. Introduction

This document sets out the response of Data Broadcasting International (DBI) to the Government consultation paper published on the 11th December 2001 – “Digital Television: The Principles for Spectrum Planning” which seeks views on the basis of the plan for the use of the spectrum currently used for terrestrial analogue television broadcasting once analogue transmissions cease.

In summary, our response makes two fundamental points:

- The paper considers that analogue television transmissions could cease by 2010 and early as 2006. However, this time frame is not realistic for a number of reasons including the fact that DBI is broadcasting under a 10 year Government licence that does not expire until 29th September 2011.
- We agree that the transition from analogue to all digital terrestrial television transmissions must be properly planned but we emphasise that there must be absolutely no degradation in either the quality or the geographical coverage of analogue transmissions before the 29th September 2011.

2. About Data Broadcasting International

Data Broadcasting International (DBI) are licensed by the Independent Television Commission under the terms of the 1990 & 1996 Broadcasting Acts to broadcast Commercial Additional Services (CAS) using the spare capacity within the signal on the ITV network.

DBI were one of the pioneers of data broadcasting, with its origins dating back to 1985, when indeed, it was required to sub-lease its capacity from the then public teletext operator – Oracle. In 1992, following the Broadcasting Act of that year, DBI bid for, and was awarded the first CAS Licence.

Since those early days, DBI's data broadcast network has spawned many satisfied customers and numerous 'behind the scenes' applications. In fact, most of the public benefit from our services on a day-to-day basis without being aware.

Some typical applications are credit card fraud prevention, real-time financial information and sports data. Tens of thousands of sites have decoders for the receipt of our broadcasts

DBI and our customers have invested significantly in the necessary infrastructure and decoder population on the basis of the longevity of the CAS Licence and the terrestrial analogue television network.

Indeed, DBI continues to invest in the development of new applications and new opportunities that maximises the potential of our available capacity. The 'push' nature of data broadcasting hugely complements the 'pull' characteristic of the Internet!

3. General Comments

Although the Government has stated the key “Availability” and “Affordability” targets before analogue terrestrial television broadcasts are switched off, it remains the case that DBI has a contractual obligation with the Government to provide an analogue terrestrial data broadcasting service under the terms of its licence until 29th September 2011. We therefore can not agree with the author that the switch off “...could start as early as 2006 and be completed by 2010”.

No analogue transmitters should be switched off before the 29th September 2011 and there must be absolutely no degradation in either the quality or the geographical coverage of analogue transmissions.

In any case, it is extremely unlikely that the targets will be reached before 2011 and this backed up by numerous reports and surveys – Just two very recent examples are quoted below:

- a) A very significant article in the Independent newspaper dated 13th January 2002 and headed “**Big switch to digital TV put off until 2010**” reported:

“Tessa Jowell, the Culture Secretary, has admitted the Government will have to delay switching off the 70-year-old analogue television signal until at least 2010 because millions of UK households do not want digital TV.

More than 11.5 million adults – a quarter of all consumers – say nothing will ever persuade them to replace voluntarily their traditional five-station service with digital sets or boxes.

The emergence of a hard-core "refusenik" group has been underlined further by retail figures revealing that, despite a mini-boom in the number of new TV sets sold over the Christmas period, only a fraction of these was digital. Industry estimates suggest that, of the two million televisions sold so far during December and January, around 40,000 were equipped for multi-channel transmissions.

Signs that the much-touted "digital revolution" is failing to inspire the British public have led ministers privately to admit defeat in their mission to convert the whole country to multi-channel TV within the next five years.

In what amounts to the Government's clearest hint yet that it could be prepared to put back the analogue switch-off from the preferred date of 2006 to 2010, Ms Jowell said: "I would expect, with the present rate of take-up, that there will be a point in 2006/2007 where we will have a clear sense of the size of, if you like, the refusenik group: the people who are disinterested."

- b) In a more recent article in the The Guardian newspaper reported on the 12th February 2002 that:

“One in four of ITV Digital's customers are cancelling their subscriptions, it emerged today as the troubled company reported a sharp drop in subscriber growth.

It means around 300,000 homes have tried and rejected ITV Digital over the past year”.

It is clear that what is needed is a **clear** and **realistic** timetable that the industry can plan its investments to and most importantly does not alienate a significant portion of viewers. Wishful thinking from the vested interests of the digital TV industry are not helpful.

The switchover from analogue to digital only transmissions may take several months or years to complete but the process should not begin until after the switch-off date, which can not be before 29th September 2011.

4. Responses to the "Questions"

Q1. "Our working assumption is that planning will continue for six multiplexes, as today. However we would also be interested in views on the costs and benefits of a more radical re-planning. Could this be either reducing or increasing the number of multiplexes by one. Do you have views on this?"

A. DBI are the sole licensed analogue broadcaster without a digital licence. If increasing the number of multiplexes to seven meant that we were awarded a digital licence, then we would welcome this step and the opportunity it would give us to migrate and expand our data broadcast services on to the digital TV network.

Q2. What do you see as the costs and the benefits of maintaining the current basis for network configuration compared with those for adopting a configuration using fewer frequency channels?

A. No view.

Q3. Do you agree that we should continue to plan on an interleaved basis to support regional services?

A. No view.

Q4. To what extent should the future of this spectrum take account to the provision of local services?

A. No view.

Q5. What factors would have to be taken into account in order to plan to support mobile broadcasting services?

A. We believe that mobile DTT reception would be a strong selling point versus cable and satellite networks and would provide an excellent way of serving households with two or more television sets.

Q6. Does this analysis of coverage potential and associated costs adequately inform those taking decisions about the level of coverage by terrestrial means that should be required for public service broadcasters?

A. No view.

Q7. Our working assumption is that the public service broadcasters should be required to reach a certain minimum percentage of households by the terrestrial platform. However, we would like your views on whether it is right to require a minimum, what that might be and the associated costs and benefits?

A. Yes but we believe that (public service) DTT coverage should be at least as good as the analogue network. Why replace it with something inferior?

***Q8.** Do you agree that the level of coverage provided by the networks supporting the four multiplexes carrying predominantly pay-tv services should be left to the commercial judgement of the operators?*

A. A minimum coverage requirement should be specified for the pay-tv services to avoid digital terrestrial television network gaining a reputation as an inferior service to cable or satellite.

***Q9.** Which channels are cleared will depend on the costs and benefits of different replanning options. For example clearing 5 channels at the top and bottom of the frequency range is less disruptive to consumers and has lower switching costs than clearing ten at the top end. The benefits, though will depend on the use to which such freed up spectrum can be put. We would like your views on the costs and benefits to different options.*

A. The priority must be to minimize disruption to the viewers when selecting the planning option for freeing up UHF channels.

***Q10.** Which frequency channels should we clear?*

A. See Q9.

5. Conclusion

In conclusion, we have made various comments on the planning process but we are fundamentally making the following two points.

- The time frame considered within the paper is not realistic for a number of reasons including the key fact that DBI is broadcasting under a 10 year Government licence that does not expire until 29th September 2011.
 - We agree that the transition from analogue to all digital terrestrial television transmissions must be properly planned but we emphasise that there must be absolutely no degradation in either the quality or the geographical coverage of analogue transmissions before DBI's CAS Licence expires on the 29th September 2011.
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